<u>REMARKS</u>

It is respectfully requested that this application be reconsidered. Claims 1 – 34 remain in the application. No claims have been amended. No claims have been canceled. No claims have been added. No amendments have been made to the specification or drawings.

Rejections:

Rejections under 35 U.S.C.§102(e)

The examiner has rejected <u>claims 16-18, 20-22 and 24</u> under 35 U.S.C.§102(e) as being anticipated by Blaker et al. (herein Blaker). The right to swear behind this reference at a later date is reserved.

<u>As to claim 16</u>, it is respectfully submitted that the Office Action does not disclose or teach all the limitations of claim 16. For example, claim 16 recites, in part, *"… a first processor to call a macro security operation … "*. The Examiner has written *"…Blaker et al. teach an apparatus comprising: a first processor to call a macro security operation to establish a secure session, (Page 2, paragraph 11)"*. It is respectfully submitted that Blaker is entirely silent as to *"macro security operation"*. Rather (*ibid*) Blaker teaches *"… operands and results [that] may be packed together in … memory, which may conserve storage space. "* all of which are distinct in the art from macro security operation. "Macro security operation" is taught is the present application (*inter alia* claim 16 and specification at at least paragraph [0024]) and the Office Action fails to show how the claimed concept of *"macro security operation"* is taught or disclosed in the cited art. As a further example, claim 16 recites, in part, *"…the second processor to perform a plurality of primitive security operations in response to the macro security operation call…"* Again Blaker is silent as to *"macro security operation call"* much less *"… to perform a plurality of primitive security operations in response… "* to one *"macro security operation call"*.

As a further example, claim 16 recites, in part, " ... *a memory coupled to the first and the second processor* ...". The Examiner has written "*...As per claim 16: ...Blaker et al. teach ... and a memory coupled to the first and the second processor...(Figure 1, 36 and 22; Page 2, paragraph 11; Page 3, paragraph 34)Blaker et al ...*". But these references clearly show a first memory coupled to a first processor and a second memory coupled to a second processor. They fail to show or teach a memory coupled to **both** a first and a second processor. Thus, Blaker cannot teach or disclose all the limitations of claim 16 and no showing of anticipation has been made. For at least the reasons recited above it is respectfully requested that the rejection of claim 16, under 35 USC§102(e) be withdrawn.

Claims 17, 18 and 20 are each dependent upon claim 16 therefore it is respectfully submitted that claims 17, 18 and 20 are allowable for at least the same reasons as claim 16. For at least this reason it is respectfully requested that the rejections of claims 17, 18 and 20, under 35 USC§102(e) be withdrawn.

Additionally, as to claim 17, it is respectfully submitted that the Office Action does not disclose or teach all the **further** limitations of claim 17. For example, claim 17 recites, in part, "*...a request unit to fetch and to distribute the macro security operation ...*". The Examiner has written "*...Blaker et al. further disclose an apparatus wherein the second processor comprises: a request unit to fetch and to distribute the macro security operation; (Page 3, paragraph 34)*". But Blaker is silent as to "*request unit*". Rather (*ibid*) Blaker teaches " *...(RNG) execution unit ... (E/A) execution unit ... and (PK) engine execution unit...*", all of which are distinct in the art from request unit. "Request unit" is taught is the present application (*inter alia* Fig.2, ref. 214 and numerous references to 214 in the specification) and the Office Action fails to show how the claimed concept of "*request unit*" is taught or disclosed in the cited art. Thus, Blaker cannot

teach or disclose all the further limitations of claim 17 and no *prima facie* showing of anticipation of claim 17 has been made.

Moreover, claim 18 is dependent upon claim 17 therefore it is respectfully submitted that claim 18 is allowable for at least the same reasons as claim 17. For at least these reasons it is respectfully requested that the rejections of claims 17 and 18, under 35 USC§102(e) be withdrawn.

As to claim 21 it is respectfully submitted that the Office Action does not disclose or teach all the limitations of claim 21. For example, claim 21 recites, in part, *"... a first processor to call a macro security operation ..."*. The Examiner has written *"...Blaker et al. teach an apparatus comprising: a first processor to call a macro security operation to establish a secure session, (Page 2, paragraph 11)"*. But Blaker is silent as to *"macro security operation"*. Rather (*ibid*) Blaker teaches *"... operands and results [that] may be packed together in ... memory, which may conserve storage space.* all of which are distinct in the art from macro security operation. "Macro security operation" is taught is the present application (*inter alia* claim 16 and specification at at least paragraph [0024]) and the Office Action fails to show how the claimed concept of *"macro security operation"* is taught or disclosed in the cited art.

As a further example, claim 21 recites, in part, *"... a memory coupled to the first and second processor ..."*. The Examiner has written *"...As per claim 16: ...Blaker et al. teach ... and a memory coupled to the first and second processor... (Figure 1, 36 and 22; Page 2, paragraph 11; Page 3, paragraph 34)Blaker et al ..."*. But these references clearly show a first memory coupled to a first processor and a second memory coupled to a second processor. They fail to show a memory coupled to **both** a first and a second processor. Thus, it is respectfully submitted that Blaker cannot teach or disclose all the limitations of claim 21 and no showing of anticipation

has been made. For at least the reasons recited above it is respectfully requested that the rejection of claim 21, under 35 USC§102(e) be withdrawn.

Claims 22 and 24 are each dependent upon claim 21 therefore it is respectfully submitted that claims 22 and 24 are each allowable for at least the same reasons as claim 21. For at least this reason it is respectfully requested that the rejections of claims 22 and 24, under 35 USC§102(e) be withdrawn.

Rejections under 35 U.S.C.§103

The Examiner has rejected claims 1-15 and 25-34 under 35 U.S.C.§103 as being unpatentable over Blaker et al. United States Publication Number 2002/0004904 (herein Blaker) in view of Bellwood et al. United States Patent Number 6,584,567 (herein Bellwood).

Claim 1. As to claim 1, it is respectfully submitted that the Office Action does not disclose, teach or render obvious all the limitations of claim 1. For example, claim 1 recites, in part, *"...calling an operation from a first processor;...".* The Examiner has written *"...As per claim 1:*

Blaker et al. teach a computer implemented method comprising: calling an operation from a first processor; (Page 2, paragraph 11 ; one or more operands are downloaded .from the system memory) ...". It is respectfully submitted that the cited reference teaches "download(ing) operands" but not *"... calling an operation..."* and that the two are distinct in the art.

As a further example, claim 1 recites, in part, *"...executing a plurality of primitive security operations at a second processor in response to the operation call;...".* The Examiner has written *"...As per claim 1: Blaker et al. teach a computer implemented method comprising: ... executing a plurality of primitive security operations at a second processor in response to the operation call; (Page 2, paragraph 11) ...".* It is respectfully submitted that the cited reference

describes *"executing an instruction that references one of the downloaded operands..."(Blaker Page 2, paragraph 11)*, but not *"...executing a **plurality** ... operations ... "* (emphasis added) still less *"...**plurality** of primitive security operations..."* or *" ...executing ... **in response to the operation call...** "* (emphasis added) as the Office Action suggests.

Thus, it is respectfully submitted that Blaker in view of Bellwood, separately or jointly, cannot teach, disclose or render obvious all the limitations of claim 1; and therefore no *prima facie* showing of obviousness has been made. For at least this reason recited above it is respectfully requested that the rejection of claim 1, under 35 USC§103 be withdrawn.

Claims 2 - 5 are each dependent upon claim 1 therefore it is respectfully submitted that claims 2 - 5 are allowable for at least the same reasons as claim 1. For at least this reason it is respectfully requested that the rejections of claims 2 - 5, under 35 USC§103 be withdrawn.

Claim 6. It is respectfully submitted that the Office Action does not disclose, teach or render obvious all the limitations of claim 6. For example, claim 6 recites, in part, *"...A computer implemented method comprising: calling a macro security operation ..."*. The Examiner has written *"...Blaker et al. teach a computer implemented method comprising: calling a macro security operation; (Page 2, paragraph 11 ; one or more operands are downloaded ... from the system memory)..."*. It is respectfully submitted that Blaker is silent as to *"macro security operation". "*. Rather (*ibid*) Blaker teaches *"... operands and results [that] may be packed together in ... memory, which may conserve storage space."* all of which are distinct in the art from macro security operation. "Macro security operation" is taught is the present application (*inter alia* claim 6 and at at least specification paragraph [0024]) and the Office Action fails to show how the claimed concept of *"macro security operation"* is taught or disclosed in the cited art.

As a further example, claim 6 recites, in part, *"...performing a set of operations in response to the macro security operation, the set of operations comprising generating a secret and a key material ..."* Again Blaker is silent as to *"macro security operation"* much less *"...performing a set of operations in response to the macro security operation, the set of operations comprising generating a secret and a key material ..."*. And since Blaker does not disclose this "performing" at all it cannot properly be construed as making obvious a performing of the operations of Bellwood in particular.

Thus, it is respectfully submitted that Blaker in view of Bellwood, separately or jointly, cannot teach, disclose or render obvious all the limitations of claim 6; and therefore no *prima facie* showing of obviousness has been made. For at least this reason recited above it is respectfully requested that the rejection of claim 6, under 35 USC§103 be withdrawn.

Claims 7 - 10 are each dependent upon claim 6 therefore it is respectfully submitted that claims 7 - 10 are each allowable for at least the same reasons as claim 6. For at least this reason it is respectfully requested that the rejections of claims 7 - 10 under 35 USC§103 be withdrawn.

Claim 11. It is respectfully submitted that the Office Action does not disclose, teach or render obvious all the limitations of claim 11. For example, claim 11 recites, in part, *"...the second network element to call a macro security operation from a first processor ..."*. The Examiner has written *"...As per claim 11: Bellwood et al teach a system comprising ... the second network element to call a macro security operation from a first processor, (Col. 5, lines 32-37, Bellwood)..."*. It is respectfully submitted that Bellwood is silent as to *"macro security operation"*. "Macro security operation" is taught is the present application (*inter alia* claim 11 and at at least specification paragraph [0024]) and Blaker also is silent as to *"macro security operation"* as discussed supra.

As a further example, claim 11 recites, in part, *"...the second network element to call a macro security operation from a first processor, to execute a plurality of primitive security operations at a second processor in response to the macro security operation call..."* Again Blaker is silent as to *"macro security operation call"* much less *"...to execute a plurality of primitive security operations at a second processor in response to the macro security operation"*.

Thus, the Office Action fails to show how the claimed concept of *"macro security operation"* is taught, disclosed, or rendered obvious in the cited art. Thus, it is respectfully submitted that Blaker in view of Bellwood, separately or jointly, cannot teach, disclose or render obvious all the limitations of claim 11; and therefore no *prima facie* showing of obviousness has been made. For at least this reason recited above it is respectfully requested that the rejection of claim 11, under 35 USC§103 be withdrawn.

Claims 12 - 15 are each dependent upon claim 11 therefore it is respectfully submitted that claims 12 - 15 are allowable for at least the same reasons as claim 11. For at least this reason it is respectfully requested that the rejections of claims 12 - 15, under 35 USC§103 be withdrawn.

Claim 25. As to claim 25, it is respectfully submitted that the Office Action fails to make a *prima facie* showing of obviousness at least because the Office Action again fails to show how the claimed limitations of *"macro security operation"* and/or *"executing a plurality of primitive security operations ... in response to the macro security operation call ..."* are taught or disclosed in the cited art. For at least this reason it is respectfully requested that the rejections of claim 25 , under 35 USC§103 be withdrawn.

Claims 26-29 and 21-34. Claims 26-29 and 21-34 are each dependent, directly or indirectly, upon claim 25 or claim 30, therefore it is respectfully submitted that claims 26-29 and 21-34 are allowable for at least the same reasons as claim 11. For at least this reason it is respectfully requested that the rejections of claims 26-29 and 21-34, under 35 USC§103 be withdrawn.

The Examiner has rejected claims 19 and 23 under 35 U.S.C.§103 as being unpatentable over Blaker et al. United States Publication Number 2002/0004904 (herein Blaker) in view of Tremblay et al. United States Patent Number 5,925,123 (herein Tremblay). The right to swear behind the Blaker reference at a later date is reserved.

Claim 19. Claim 19 is dependent upon claim 17 therefore it is respectfully submitted that claim 19 is allowable for at least the same reasons as claim 17.

Thus, it is respectfully submitted that Blaker in view of Tremblay, or vice versa, separately or jointly, cannot teach, disclose or render obvious all the limitations of claim 19; and therefore no *prima facie* showing of obviousness has been made for claim 19. For at least this reason recited above it is respectfully requested that the rejection of claim 19, under 35 USC§103 be withdrawn.

Claim 23. Claim 23 is dependent upon claim 21 therefore it is respectfully submitted that claim 19 is allowable for at least the same reasons as claim 21. For at least these reasons it is respectfully requested that the rejection of claim 23, under 35 USC§103 be withdrawn.

Claim 30. As to claim 30, it is respectfully submitted that the Office Action fails to make a *prima facie* showing of obviousness at least because the Office Action again fails to show how the claimed limitations of *"macro security operation"* and/or *"performing a set of operations ...in response to the macro security operation, the set of operations comprising generating a secret and a key material [etc] ..."* are taught or disclosed in the cited art. For at least this reason it is respectfully requested that the rejections of claim 30, under 35 USC §103 be withdrawn.

Conclusion

It is respectfully requested that the grounds for rejection be reconsidered in the light of remarks and claims 1 to 34 be allowed and the case passed to issue.

A petition for extension of time to respond accompanies this paper.

Invitation for a telephone interview

The Examiner is invited to call the undersigned at 408-720-8300 if there remains any issue with allowance of this case.

Charge our Deposit Account

Please charge any shortage to our Deposit Account No. 02-2666.

Respectfully submitted,

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